

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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|                           |   |                                |
|---------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, | ) | Case No. 17-cr-00134 (WMW-DTS) |
|                           | ) |                                |
| Plaintiff,                | ) |                                |
|                           | ) |                                |
| v.                        | ) | <b>MOTION TO CONTINUE</b>      |
|                           | ) | <b>MOTION FILING DATE AND</b>  |
| John Kelsey Gammell,      | ) | <b>MOTION HEARING</b>          |
|                           | ) |                                |
| Defendant.                | ) |                                |
|                           | ) |                                |

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The Defendant, by and through his attorney, hereby respectfully move the Court for a continuance of the presently set date for the filing of motions of July 19, 2017, and the motion hearing date of August 9, 2017.

The discovery material in this case is voluminous. The case is complex and the first of its kind in Minnesota. Counsel and her client need significant time to review the voluminous discovery and adequately prepare for pretrial proceedings and as such are moving for a continuance.

The government does not object to this motion. A signed Statement of Facts will be filed separate from this motion.

For the above reasons, the defendant is requesting that the presently set motion filing date be continued for 30 days.

Dated: July 12, 2017

Respectfully submitted,

s/ Rachel K. Paulose

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